

# **EXHIBIT “B”**

Cause No. \_\_\_\_\_

<b>Mattie Arnold-Anderson</b>	§	<b>IN THE DISTRICT COURT OF</b>
<i>Plaintiff,</i>	§	
	§	
<b>-VS-</b>	§	<b>HARRIS COUNTY, TEXAS</b>
	§	
<b>Direct ChassisLink, Inc.</b>	§	
<i>Defendant.</i>	§	<b>_____ JUDICIAL DISTRICT</b>

**PLAINTIFF'S ORIGINAL PETITION WITH REQUEST FOR DISCLOSURES****TO THE HONORABLE JUDGE OF SAID COURT:**

Mattie Arnold-Anderson files this Plaintiff's Original Petition with Request for Disclosures complaining of Defendant, Direct ChassisLink, Inc. and respectfully shows as follows:

**I.****DISCOVERY PLAN LEVEL 1**

Plaintiff intends that discovery be conducted under Discovery Level 1

**II.****CLAIMS FOR RELIEF**

Plaintiff sues Defendant and seeks monetary relief less than \$250,000 and demands judgment for all other relief which Plaintiff shows herself entitled.

**III.****PARTIES**

Plaintiff is an individual and resident of Harris County, Texas.

Defendant Direct ChassisLink, Inc., is a foreign corporation that conducts substantial business in Texas. This Defendant may be served with process through their registered agent CT Corporation System at 1999 Bryan Street, Suite 700, Dallas, Texas 75201-3136.

**IV.****JURISDICTION OF VENUE**

This court has jurisdiction over this case and the damages sought are within the jurisdictional limits of this court. Venue is proper in Harris County, Texas, because the accident made the basis of this lawsuit occurred in Harris County at the time the cause of action accrued.

**V.**

**FACTUAL BACKGROUND**

This is a suit for negligence. On or about March 22, 2022, Plaintiff, Mattie Arnold-Anderson was driving a 2019 Mercedes Benz E300 traveling at I-45S and Kuykendahl in Harris County, Texas. Defendant's driver was driving a Kenworth 18 wheeler (owned by Direct ChassisLink, Inc.) was also traveling at traveling at I-45 S. and Kuykendahl failing to merge safely striking Plaintiff's vehicle, causing the collision. As a result of the collision, Plaintiff sustained serious personal bodily injuries.

**VI.**

**CAUSES OF ACTION**

Defendant Direct ChassisLink, Inc., is liable for the actions of its driver, who was acting in the course and scope of their employment in furtherance of the business interests of Direct ChassisLink, Inc. On the occasion in question, their driver operated a commercial vehicle in a negligent manner, in that he violated the duty which he/she owed the Plaintiff to exercise ordinary care in the operation of the motor vehicle in one or more of the following particulars:

1. In failing to merge into a single lane safely;
2. In disregarding the safety of other vehicles/passengers;
3. In failing to maintain safe distance;
4. In failing to operate the vehicle safely;
5. Driver inattention.
3. Failing to timely apply the brakes to avoid collision with Plaintiff.
4. In any combination of two or more of the above.

Additionally, and without waiving the foregoing, Defendant, Direct ChassisLink, Inc., were negligent in hiring their driver, and it was negligent in entrusting its vehicle to Defendant's driver when they knew, or should have known, he/she was a reckless and/or irresponsible driver.

**VII**

**DAMAGES**

Because of her bodily injuries proximately caused by Defendant's negligence, Plaintiff is entitled to reasonable and proper compensation for the following legal damages:

- a. past and future medical expenses;
- b. past and future physical pain; and
- c. past and future pain and suffering;

Plaintiff, Mattie Arnold-Anderson further would show that as a result of the incident made the basis of this suit, she has been caused to incur debts and expenses for the rental expenses/property damages her car sustained in the accident, As a further proximate result of the hereinabove alleged carelessness and negligence of said defendant, plaintiff, Mattie Arnold-Anderson lost the use of her automobile for period of time, all to this further special damage in an appointment equal to the reasonable value of said loss of use.

**VIII**  
**REQUEST FOR DISCLOSURES**

Pursuant to Texas Code of Civ. Pro. 194, Defendant is hereby requested to disclose the information and material described in Rule 194.2 **within fifty (50) days** of the service of this request.

**IX.**  
**PRAYER**

Plaintiff prays that the Defendant, be cited to appear and answer the allegations set forth in this petition, and that upon final hearing, Plaintiff be awarded a judgment against Defendant for the damages prayed for herein; costs of the court; pre-judgment and post-judgment interest on the total amount of judgment awarded at the highest legal rate provided for by law; and such other and further relief, general or special, at law or in equity, to which Plaintiff may be justly entitled.

Respectfully submitted,

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